

## **U.S.** Department of Justice

## *United States Attorney* Eastern District of New York

EAG/JDG/CMP F.#2008R00530

271 Cadman Plaza East Brooklyn, New York 11201

July 25, 2011

## By ECF

Adam D. Perlmutter, Esq. 260 Madison Avenue, Suite 1800 New York, NY 10016

Carl Jordan Herman, Esq. 443 Northfield Avenue West Orange, NJ 07052

Samuel M. Braverman, Esq. 901 Sheridan Avenue Bronx, NY 10451

Susan Kellman, Esq. 25 8th Avenue Brooklyn, NY 11217

David Stern, Esq. Rothman, Schneider, Soloway & Stern, P.C. 100 Lafayette Street, Suite 501 291 Broadway, Suite 709 New York, NY 10013

Jane Fisher-Byrialsen, Esq. Fisher, Byrialsen & Kreizer, PLLC New York, NY 10007

Re: United States v. Thomas Gioeli, et al. Criminal Docket No. 08-240 (S-6) (BMC)

## Dear Counsel:

The government hereby furnishes the following additional discovery in the above-captioned case. The government also renews its request for reciprocal discovery. Please note that the following exhibits are draft transcripts, which are being provided for purposes of trial preparation only and are subject to change.

EXHIBIT	DESCRIPTION
1241	Draft transcript of 911 calls and police radio runs made on June 12, 1991, in connection with the murders of John Minerva and Michael Imbergamo

EXHIBIT	DESCRIPTION
1242	Draft transcript of 911 calls and police radio runs made on March 25, 1992, in connection with the murder of Frank Marasa
1243	Draft transcript of 911 calls and police radio runs made on August 25, 1997, in connection with the murder of Ralph Dols
1244	Phonebook obtained from Salvatore Vitale
1245	List of names including reference to defendant Dino Saracino
1246	CD containing surveillance video dated April 12, 1999 (Thomas Gioeli, John DeRoss, Joseph Campanella and Benjamin Castellazzo)
1247	CD containing photographs of locations in New York City and Long Island
1248	CD containing trial transcript of <u>United</u> <u>States v. Persico and DeRoss</u> , 04 CR 911 (EDNY) (JS), November 6, 2007 to December 28, 2007

If you have any questions or requests, please contact us.

Sincerely,

LORETTA E. LYNCH UNITED STATES ATTORNEY

By: /s/ Cristina M. Posa
Elizabeth A. Geddes
James D. Gatta
Cristina M. Posa
Assistant U.S. Attorneys

cc: Clerk of the Court (BMC) (by ECF)